

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
W.R. Grace & Co., <u>et al.</u> ,)	Case No. 01-01139 (KJC)
)	(Jointly Administered)
Debtors.)	

**NOTICE OF APPEARANCE OF COUNSEL AND
DEMAND FOR NOTICES AND PAPERS**

Please take notice that the undersigned firm of Richardson, Patrick, Westbrook & Brickman, LLC hereby enters its appearance as counsel to the ZAI Claimants (“ZAI”) in the above-captioned case, pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the Court’s March 31, 2014 *Order Authorizing the Elimination of Existing Service List and the Creation of a New Service List*, ¶ 6 (D.I. 31962); such counsel hereby requests, pursuant to Bankruptcy Rules 2002 and 9007, Local Rules 2002-1, and sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned cases be given and served upon the following persons at the following addresses, telephone and telecopy numbers:

Edward J. Westbrook, Esq.
Richardson, Patrick, Westbrook & Brickman, LLC
1037 Chuck Dawley Blvd., Bldg. A
Mt. Pleasant, South Carolina 29464
Telephone: (843) 727-6500
Facsimile: (843) 727-6688
E-mail: ewestbrook@rpwb.com

Please take further notice that pursuant to section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy rules and sections of the Bankruptcy Code specified above, but also includes,

without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed or made with regard to the above-captioned cases and proceedings therein.

This Notice of Appearance and Demand for Notices and Papers shall not be deemed or construed to be a waiver of (a) ZAI's rights (i) to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) to trial by jury in any proceeding so triable in these cases or in any case, controversy, or proceeding related to these cases, and (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (b) any other rights, claims, actions, setoffs, or recoupments to which ZAI is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments ZAI expressly reserves.

Date: April 8, 2014
Wilmington, DE

SULLIVAN · HAZELTINE · ALLINSON LLC

/s/ William D. Sullivan

William D. Sullivan (No. 2820)
Seth S. Brostoff (No. 5312)
901 N. Market Street, Ste. 1300
Wilmington, DE 19801
Tel: (302) 428-8191
Fax: (302) 428-8195

-and-

Edward J. Westbrook, Esq.
Richardson, Patrick, Westbrook
& Brickman, LLC
1037 Chuck Dawley Blvd., Building A
Mount Pleasant, SC 29464
Tel: (843) 727-6513
Fax: (843) 727-6688

LEAD COUNSEL FOR ZAI CLAIMANTS